


From: Flores, Carlos
To: Troy.Harris@REGI.com
Subject: Re: Sorry to hear about the latest incident
Date: Monday, December 14, 2015 9:32:10 AM
Attachments: [REG 2nd Incident Questions and Status on 1st.docx](#)

Mr. Harris, it has more than 90 days since the last time I reached out to you. Please try your best to get me the info by the end of the year. Thanks.

From: Flores, Carlos
Sent: Thursday, September 10, 2015 10:35 AM
To: Troy.Harris@REGI.com
Subject: Sorry to hear about the latest incident

Mr. Harris,

I am sure you have your hands full but would like to get an answer to the same informal questions regarding the incident last Thursday. Will give you a couple of weeks. You have my email and phone number. Also, can we get a status update on the final report for the April incident? Thanks.

Carlos B. Flores
U.S. EPA Region 6
Compliance and Enforcement Division
Air Branch / Toxics Enforcement Section
Mail Code: 6 EN-AT
1445 Ross Avenue Suite 1200
Dallas, TX 75202-2733
(214) 665-7113 
flores.carlos@epa.gov

Dear Mr. Harris:

Please answer the following questions regarding the release event from REG Geismar LLC in Geismar, LA on September 4, 2015. Also, please provide the latest update on the final report that was promised to US EPA Region 6 regarding the April 2, 2015 release event at REG Geismar LLC.

Please provide the following information for the noted event:

1. Provide the name, title, email, phone number and mailing address for the person to whom correspondence should be sent regarding the release.
2. Who owns and/or operates the location where the event occurred?
3. Briefly describe the facility, e.g. discuss what activities take place on-site and what substances are produced, processed, handled or stored on-site.
4. What process units or equipment were involved in the event? Provide a brief description and process flow diagram for the processes involved.
5. At the time of the incident, was the facility operating under a Title V Air Permit?
6. What is the SIC or NAICS code for the facility where the event occurred?
7. Did the event take place at a Risk Management Program covered process?
8. Provide a detailed description and timeline of the event. Include the best known start time and duration of the incident and the timeline for any emergency response.
9. What specific substances were released during the event, including the estimated or known amounts of each substance? Include all air contaminants that were released during the event, even those materials with release amounts below the reportable quantity.
10. Have there been any investigations or audits of the event? Are investigations or audits pending? Who performed the investigations or audits? Provide a copy of the reports, audits, or any other analysis describing the causes and consequences of the event, including all draft reports and/or draft audit results.
11. What is the initial best known cause or root cause of the event? Were there any additional contributing factors that you are aware of?
12. What measures have been taken to address the findings, conclusions or recommendations of the investigations or audits?

13. Are there any findings, conclusions, or recommendations that have not been addressed fully, and if so, what measures remain to be taken, and what is the expected timeline for implementing those measures?
14. Were there any fatalities or injuries attributed to the event? If yes, explain.
15. Did you, or anyone else, issue any evacuation, road closure, or shelter-in-place orders as a result of the event for your facility or surrounding community? If yes, explain.
16. Was there any property or equipment damage, both on-site and/or off-site, that resulted from the event? If yes, explain.
17. What emergency response measures were taken, by you or anyone else, to stop and/or to minimize hazards from the event?
18. Did you or anyone else the facility perform any air monitoring during or after the event, including any routine monitoring? If so, then please provide a summary of the results.
19. Identify and provide copies of any industry standards, internal standards, SOPs, or manufacturer's recommendations related to the incident including equipment, process units, and personnel activities involved in the incident.
20. Please provide any documents associated with the identification of hazards at your facility related to the incident.
21. Has any local, state, or federal agency conducted an investigation or requested information regarding the event? If so, please provide the name and contact information for each agency person who conducted an inspection or requested information.

If you plan to claim any information as confidential business information, please call me so that we can discuss options **prior** to your sending - DO NOT EMAIL.

If you have any questions, please feel free to contact me at the email/phone listed below. Please provide the above requested information by COB on December 29, 2015. I understand it is the holiday season, so let me know if there are any issues getting us the response back in a timely manner.

Carlos Flores
(214) 665-7113
flores.carlos@epa.gov

From: Troy Harris
To: Flores, Carlos
Subject: RE: Did you guys send your responses?
Date: Thursday, January 28, 2016 4:45:33 PM

Good Evening Carlos

I will be sending the documents that you requested by email and hard copy by mail tomorrow.

Regards

Troy

From: Flores, Carlos [mailto:Flores.Carlos@epa.gov]
Sent: Thursday, January 28, 2016 1:01 PM
To: Troy Harris
Subject: Did you guys send your responses?

Haven't seen yet. Did you mail hard documents or send an email?

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